

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 5

Robin Kelly  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Dear Ms. Kelly,

The purpose of this letter is to respond to your letter dated July 17, 2013 regarding the Year-End Quarterly Report (10/01/12-12/31/12) of American Action Network Inc.

All 24-hour and 48-hour reports were filed in a timely manner with the exception of three 48-hour reports noted below. These three filings were delayed due to inadvertent administrative errors ? such as late invoicing by vendors ? and were filed on 10/24/12 and 10/26/12 as soon as the errors were identified and corrected. As noted in your letter, Schedule E of the report and the relevant 24-hour and 48-hour reports list payment dates for independent expenditures, not dissemination dates. The dissemination date of each independent expenditure is listed below per your request.

Your letter also inquires about the reporting of contributions to American Action Network Inc. and suggests that the Year-End Quarterly Report include this information. The Commission's regulations require the disclosure of contributions only when a ?contribution was made for the purpose of furthering the reported independent expenditure.? 11 C.F.R.109.10(e)(1)(vi). American Action Network Inc. had no such contributions, therefore, no contribution disclosure was required and no amendment of its Year-End Quarterly Report is necessary. If American Action Network Inc. receives contributions that are subject to these requirements, those contributions will be reported. For purposes of future reports, the omission of contribution information should not be assumed to be an oversight. Your letter also cites 11 C.F.R. 114.10(f) which applies to solicitations made by qualified nonprofit corporations, however, the American Action Network Inc. is not a qualified nonprofit corporation. Therefore, 11 C.F.R. 114.10(f) is inapposite.

Sincerely,  
Stephanie Fenjiro

American Action Network (C90011230)  
Year End Report (10/1/12-12/31/12)  
24-Hour Notices

NAME	PAID DATE	AMOUNT
Scott Howell & Company	10/23/2012	20,404.99
Purpose: Production		
Candidate: Jose Hernandez		
Filed:10/25/2012		
Dissemination Date:10/24/2012		

American Media & Advocacy Group	10/23/2012	98,299.04
Purpose: Purchase		
Candidate: Julia Brownley		
Filed: 10/26/2012		
Paid: 10/25/2012		

Something Else Strategies	10/24/2012	3,000.00
---------------------------	------------	----------

\*\*\*\*\*